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 Goodrich Pump & Engine Control Systems, Inc.
 (erroneously sued as Goodrich Corporation and
 BF Goodrich Aerospace)

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

DEBORAH GETZ, et al.

Plaintiffs,

vs.

THE BOEING COMPANY, et al.

Defendants.

No. CV 07-06396 CW

**JOINDER OF DEFENDANT
 GOODRICH PUMP & ENGINE
 CONTROL SYSTEMS, INC. TO
 DEFENDANT HONEYWELL
 INTERNATIONAL INC.'S MOTION
 FOR PROTECTIVE ORDER;
 DECLARATION OF MARK R.
 IRVINE**

Date: June 19, 2008 (original hearing
 date prior to being assigned to Magistrate
 Judge James)
 Time: 10:00 a.m.
 Courtroom: B, 15th Floor
 Judge: Hon. Maria-Elena James

TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that defendant Goodrich Pump & Engine Control Systems, Inc. ("Goodrich") hereby joins in defendant Honeywell International Inc.'s ("Honeywell") motion for protective order, filed May 6, 2008 (docket no. 75), and incorporates herein such motion and supporting papers by reference. Honeywell's motion for protective order is for the limited purpose of staying its responses to Plaintiffs' Requests for Admission until after Honeywell's pending motions, including a motion to dismiss the complaint, in which all defendants joined, is resolved.

1 Plaintiffs served the same discovery on Goodrich, and Goodrich accordingly seeks
2 the same relief as stated in Honeywell's motion, for the same reasons.

3 Honeywell's motion was originally set for June 19, 2008, at 2:00 p.m. before the
4 Honorable Claudia Wilken. On May 7, 2008, Judge Wilken vacated the original hearing
5 date, and referred the motion, and all further discovery motions, to a Magistrate Judge,
6 the Honorable Maria-Elena James. As of the date of this filing, a new hearing date and
7 time has not been set by Judge James. In an abundance of caution, Goodrich files this
8 joinder to be timely with the originally set hearing date.

9 Pursuant to Fed. R. Civ. P. 26(c)(1), Goodrich certifies that on May 15, 2008,
10 Mark R. Irvine, counsel for Goodrich, conferred with counsel for plaintiffs, Thomas J.
11 Brandi, in a good faith effort to resolve this dispute without Court action. (See
12 Declaration of Mark R. Irvine, attached hereto, ¶ 2.) Mr. Brandi declined to extend or
13 stay Goodrich's responses to Plaintiffs' Requests for Admissions. (*Id.*)

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15 Dated: May 15, 2008

MENDES & MOUNT, LLP

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17 By: _____/s/
18 Mark R. Irvine
19 Attorneys for Defendant
20 Goodrich Pump & Engine Control
21 Systems, Inc.
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DECLARATION OF MARK R. IRVINE

I, Mark R. Irvine, declare as follows:

1. I am a member in good standing of the State Bar of California and am licensed to practice before all of the Courts of the State of California, including all the federal district courts and the Ninth Circuit Court of Appeals. I am employed by Mendes & Mount, LLP, counsel of record for defendant Goodrich Pump & Engine Control Systems, Inc. ("Goodrich") in this action. I submit this declaration in support of Goodrich's Joinder to Honeywell International Inc.'s ("Honeywell") motion for protective order. Except as otherwise stated, I have personal knowledge of the facts set forth herein, and if called upon to do so, I could and would testify thereto based on such personal knowledge.

2. On May 15, 2008, I telephoned and emailed Plaintiffs' counsel Tom Brandi regarding an extension or stay of the Requests for Admission at issue, for up to 30 days beyond the date of this Court's ruling on the pending motions to dismiss and stay (and unless the Court orders otherwise as to the motion to stay). Plaintiffs counsel declined to extend or stay the discovery.

I declare under penalty of perjury, under the laws of the United States of America that the foregoing is true and correct.

Executed on May 15, 2008 at Los Angeles, California.

/s/

Mark R. Irvine